

Application granted. In light of the extended deadline to file pretrial materials, the case management conference scheduled for October 3, 2024 is adjourned to October 21, 2024 at 2:30 p.m. in Courtroom 520 of the White Plains courthouse.

The Clerk of Court is respectfully directed to terminate the letter motion pending at Doc. 25.

SO ORDERED.



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
October 2, 2024

Honorable Philip M. Halpern  
United States District Court Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

**Re: Robinson et al v. Big Minds, Tiny Hands LLC et al. (23-cv-05908)**

Dear Judge Halpern,

Our office represents the Plaintiffs, Aja-Rae Robinson and Antionette Brown in the above captioned matter. We write jointly with the defendants to respectfully request a brief one-day extension to complete the filing of materials in accordance with Your Honor's Individual Rules of Practice 6(B). The current deadline ordered by Your Honor is October 1, 2024. Accordingly, the parties respectfully request that the new deadline to complete and file materials be October 2, 2024.

The reason for this request is as follows:

For the Plaintiff, Plaintiff's lead counsel has taken on more of a workload for the next two weeks, which includes motion practice in other cases, appearances, and scheduled depositions. This comes as a result of the firm's other partner, Mr. Alban Dunisha, taking leave this past week to care for his wife and newborn daughter who arrived on Saturday, September 28<sup>th</sup>, 2024. While this is a joyous occasion, the workload is now quite voluminous, counsel is a small firm, and this brief extension would allow counsel additional time to work assiduously on the materials for the Court.

For the Defendants, counsel was on trial for nearly one-month from August 7, 2024, until verdict was reached on September 5, 2024, on indictment 72917-2023. Since defense counsel is a solo-practitioner, all firm business was essentially shut down for the duration of trial and counsel is only now catching up with everything that was placed on hold during that time.

We apologize for not writing to the Court sooner, and fully recognize that Your Honor has been gracious with granting extensions. However, as the parties were actively engaged in numerous matters, it became apparent that there would be no way to complete the voluminous *voir dire* instructions and other materials on time. This is the parties' first joint request for an extension to file the materials as required under 6(B) of Your Honor's Individual Rules of Practice and Your Honor's Order dated September 27, 2024 (Doc.23). The parties have already filed their Proposed Joint Pre-Trial Order in accordance with Your Honor's Order (Doc. 24).

We thank the Court for its consideration in this matter.

Sincerely,

**L & D LAW P.C.**

/s/

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